

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

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MOOG INC.,

Plaintiff,

Case No.: 22-cv-187-LJV-JJM

vs.

SKYRYSE, INC. ROBERT ALIN PILKINGTON, MISOOK
KIM, and DOES NOS. 1-50

Defendants.
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**DECLARATION OF ANTHONY D. GREEN IN SUPPORT OF ROBERT ALIN
PILKINGTON AND MISOOK KIM’S MEMORANDUM OF LAW IN SUPPORT
OF THEIR ACTIONS TO CLAW BACK MATERIALS PROVIDED UNDER
THE PROTECTIVE ORDER**

Anthony D. Green, under penalty of perjury and pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of Winget Spadafora & Schwartzberg, LLP, counsel to Defendants Robert Alin Pilkington and Misook Kim (collectively, the “Individual Defendants”) in the above-referenced action.

2. I submit this Declaration in support of the Individual Defendants’ Memorandum of Law in Support of their Actions to Claw Back Materials Provided Under the Protective Order, filed on August 11, 2022 (“Motion”).

3. Annexed hereto as Exhibit A is a true and correct copy of the Individual Defendants’ Responses to Plaintiff’s First Set of Requests for Production of Documents and Things.

4. Annexed hereto as Exhibit B is a true and correct copy of the Individual Defendants' June 29, 2022 email to iDS providing the attorney-work product and privacy privilege logs to excise from the Individual Defendants' devices.

5. Annexed hereto as Exhibit C is a true and correct copy of a June 29, 2022 email from iDS providing Plaintiff with the Zoom link to begin review of the devices in iDS' custody.

6. Annexed hereto as Exhibit D is a true and correct copy of excerpts from the transcript of proceedings before the Court on May 5, 2022.

7. Annexed hereto as Exhibit E is a true and correct copy of Plaintiff's Responses to Defendant Skryse, Inc.'s First Set of (Expedited) Interrogatories.

8. Annexed hereto as Exhibit F is a true and correct copy of email communications between Plaintiff and the Individual Defendants concerning Plaintiff's missing document productions.

9. Annexed hereto as Exhibit G are true and correct copies of emails between Plaintiff and the FBI.

10. Annexed hereto as Exhibit H is a true and correct copy of excerpts from the transcript of proceedings before the Court on July 27, 2022.

11. Annexed hereto as Exhibit I is a true and correct copy of excerpts from the transcript of proceedings before the Court on August 4, 2022.

12. Annexed hereto as Exhibit J is a true and correct copy of the June 10, 2022 letter from Plaintiff to the Court.

13. Annexed hereto as Exhibit K is a true and correct copy of July 29, 2022 email communications between the Individual Defendants, Plaintiff, Skyrise, and iDS regarding halting access to the Individual Defendants' electronic devices.

14. As set forth herein, and as argued through the accompanying memorandum of law, the undersigned respectfully requests this Court grant the Individual Defendants' Motion in its entirety, with such other relief as the Court deems equitable, just and proper.

Dated: August 11, 2022
New York, New York

/s/ Anthony D. Green
Anthony D. Green